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Attorneys for Plaintiff  
LA CANADA VENTURES, INC.

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

LA CANADA VENTURES, INC.,

Plaintiff,

v.

MDALGORITHMMS, INC.,

Defendant.

Case No. 3:22-cv-07197-RS

**STIPULATION AND ORDER RE FILING  
OF AND RESPONSE TO SECOND  
AMENDED COMPLAINT  
[FRCP 15(a); Local Rule 6-2]**

**Honorable Richard Seeborg**

**IT IS HEREBY STIPULATED** by and between Plaintiff La Canada Ventures, Inc. (“Plaintiff”) and Defendant MDalgorithms, Inc. (“Defendant”) (Plaintiff and Defendant, collectively, the “Parties”) as follows, pursuant to Civil Local Rule 6-2:

1. WHEREAS, on July 28, 2023, Plaintiff filed and served its Amended Complaint in this action. *See* Dkt. No. 26 through 26-2;

2. WHEREAS, on August 10, 2023 the Parties filed a stipulation to extend the time for Defendant to respond to the Amended Complaint until August 18, 2023. *See* Dkt. No. 28;

3. WHEREAS, the Parties disagree as to whether Count V of the Amended Complaint complies with F.R.C.P. 10(b) and they met and conferred to successfully reach a resolution;

**NOW, THEREFORE**, the Parties, through their undersigned counsel, stipulate as follows:

1. Plaintiff will file and serve a Second Amended Complaint on or before August 24, 2023, which will contain the same factual allegations as contained in the Amended Complaint;

2. Defendant stipulates to the filing of the Second Amended Complaint pursuant to F.R.C.P. 15;

3. Defendant will file its response to the Second Amended Complaint by no later than seven (7) calendar days after the Second Amended Complaint is filed, and such response will not be a motion challenging the adequacy of the pleading of the Second Amended Complaint or otherwise seek to dismiss or strike the allegations in the Second Amended Complaint;

4. This stipulation does not change or otherwise impact any dates or deadlines set by the Court.

DATED: August 18, 2023

Respectfully submitted,

MCCARTNEY DALLMANN LLP  
KEY IP LAW GROUP, PLLC

By: /s/ Cecil E. Key/  
Cecil E. Key  
Attorneys for Plaintiff  
La Canada Ventures, Inc.

DATED: August 18, 2023

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/ Ian K. Boyd  
Ian K. Boyd  
Attorneys for Defendant  
MDalgorithms, Inc.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2  
3  
4 Dated: August 18, 2023



Honorable Richard Seeborg  
UNITED STATES DISTRICT JUDGE

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7  
8 **ATTESTATION**

9  
10 Pursuant to Civil Local Rule 5.1., I hereby attest that all counsel represented by conformed  
11 signatures above have concurred in the filing of this Stipulation and [Proposed] Order re Filing of  
12 and Response to Second Amended Complaint.

13  
14 DATED: August 18, 2023

SIDEMAN & BANCROFT LLP

15 By: /s/ Ian K. Boyd